



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

November 30, 2018

Cicely A. Muldoon, Superintendent
National Park Service
Point Reyes National Seashore
1 Bear Valley Road
Point Reyes Station, California 94956

Subject: Notice of Intent to prepare an Environmental Impact Statement for a General Management Plan Amendment, Point Reyes National Seashore and North District of Golden Gate National Recreation Area, Marin County, California.

Dear Ms. Muldoon:

The Environmental Protection Agency (EPA) has reviewed the subject Notice of Intent (NOI) to prepare an Draft Environmental Impact Statement (DEIS) for the above action. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. To assist in the scoping process for the project, this letter provides EPA's recommendations for the National Park Service's consideration in the development of the EIS.

Purpose and Need

The NOI states that the need for the proposed action is to "address the park's highest priority planning issues, which include the management of approximately 28,800 acres of land currently leased for ranching". To guide the development of an appropriate range of reasonable alternatives, EPA recommends that the need statement clarify the issue (i.e., underlying problem, conflict, or opportunity) regarding management of the leased lands and identify the full suite of "highest priority planning issues" that the NPS seeks to address through the proposed action.

Range of Alternatives

According to the Notice of Intent, the NPS is required, under the terms of a Settlement Agreement, to "give full consideration to and disclose the impacts of three alternatives: (1) No ranching; (2) no dairy ranching; and (3) reduced ranching." In accordance with the regulation at 40 CFR 1502.14(c), any additional reasonable alternatives that would fulfill

the project's purpose and need should also be evaluated in detail in the DEIS. Explain, in the DEIS, the reasons for the elimination of any alternatives that are not evaluated in detail. If the environmentally preferable alternative has been identified, disclose it in the DEIS.

Water Quantity

Based on the PORE Public Scoping Newsletter¹ additional lands would be made available for "row crops and other livestock" under some of the alternatives. EPA recommends that the DEIS include a comparison of the water usage requirements of each alternative, including a comparison of the water usage requirements of any proposed food or feed crops. We also recommend that the DEIS describe the water source(s) and projected impacts of each alternative on each water source. Consider reasonably foreseeable changes in climate that could exacerbate or mitigate such impacts.

Water Quality

The DEIS should disclose and analyze the potential impacts on water quality that could occur under each alternative as a result of both point and nonpoint source discharges. Disclose and analyze the impacts of the types of wastewater discharge and runoff expected, taking into consideration activities such as fertilizer and pesticide use, as well as livestock waste management. Water quality impacts may include, but are not limited to: nutrients, sediment, fecal indicator bacteria, thermal changes, increases in suspended solids, biological waste, toxicity, and changes in pH. Include, in the DEIS, available data from any existing discharge, runoff, and water quality monitoring efforts.

Discuss, in the DEIS, existing water quality in and downstream of the planning area and identify any existing impairments. The Clean Water Act (CWA) requires States to develop a list of impaired waters that do not meet water quality standards; establish priority rankings; and develop action plans, called Total Maximum Daily Loads (TMDLs), to improve water quality. Tomales Bay is listed as impaired for pathogens, mercury, nutrients, and sedimentation. The San Francisco Bay Regional Water Quality Control Board (Regional Board) has developed separate TMDLs for pathogens and for mercury for Tomales Bay. Additionally, the Regional Board regulates grazing lands through waste discharge requirements in order to implement the pathogen TMDL and address potential discharges from agricultural runoff. The DEIS should evaluate each alternative's impacts to water quality, and demonstrate how each alternative would meet Tomales Bay TMDL requirements and comply with the Regional Board's Grazing Waiver program. EPA recommends that the NPS coordinate with the Regional Board in development of appropriate conservation and management practices for future grazing activities.

Point Reyes National Seashore falls within the boundaries of the Greater Farallones National Marine Sanctuary, a nationally significant marine ecosystem that supports many threatened and endangered species. EPA recommends that the DEIS evaluate the potential

¹ <https://parkplanning.nps.gov/document.cfm?documentID=91640>

impacts of each alternative on water quality in the Sanctuary's near-shore and estuarine environments, including Tomales Bay.

Species of Concern

Identify in the DEIS all federally listed threatened or endangered species and critical habitat, as well as other species of concern that might occur within the project area. For each alternative, discuss any direct, indirect, or cumulative impacts on such species or habitat. Disclose in the DEIS the status or outcome of consultation with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act, if applicable, and include the biological assessment in an appendix. For each alternative under which non-native species would be introduced or increased in number within the planning area, identify the species and evaluate the potential impacts, including any potential conflicts with native species and their habitat.

Air Quality

Disclose, in the DEIS, the current status of the planning area with respect to attainment of national ambient air quality standards. Identify all sources of air quality emissions, including those from agricultural operations, that would occur under each alternative. For example, crop and livestock production are a significant source of greenhouse gas emissions (<https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions>). Quantify emissions to the extent possible to facilitate comparisons across alternatives. Disclose any measures that could avoid, minimize, or mitigate air emissions.

We appreciate the opportunity to review this NOI. When the DEIS is released for public review, please send one hard copy and one electronic copy to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3852 or munson.james@epa.gov.

Sincerely,


James Munson, Lead Reviewer
Environmental Review Section